

\_\_\_\_\_

410352

**S.S.WALES SH-77**

<b>SENDER:</b> Complete Items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.	
1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. †(Extra charge)†	2. <input type="checkbox"/> Restricted Delivery †(Extra charge)†
3. Article Addressed to: <b>HEAT BATH CORPORATION</b> <b>C/O JAMES L. CASEY</b> <b>2333 S. WACKER</b> <b>8300 SEARS TOWER</b> <b>CHICAGO, IL 60606</b>	
4. Article Number: <b>P759199592</b> Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	
Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>	
5. Signature — Addressee <b>X</b>	8. Addressee's Address ( <i>ONLY if requested and fee paid</i> )  <div style="border: 1px solid black; border-radius: 15px; width: fit-content; margin: auto; padding: 10px; text-align: center;">           10701         </div>
6. Signature Agent <b>X</b> <i>J Garcia</i>	
7. Date of Delivery <b>MAR 16 1988</b>	

10702

LAW OFFICES OF  
**KECK, MAHIN & CATE**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

8300 SEARS TOWER  
233 SOUTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606-6589  
(312) 876-3400

CABLE ADDRESS  
"HAMSCOTT"

TELEX  
25-3411

TELECOPIER  
(312) 876-3582

FILE NUMBER 876-3359  
DIRECT DIAL

WASHINGTON OFFICE:  
1730 PENNSYLVANIA AVENUE, N.W.  
SUITE 350  
WASHINGTON, D.C. 20006-4706  
(202) 347-7006

PEORIA OFFICE:  
PEORIA SAVINGS PLAZA  
SUITE 640  
PEORIA, ILLINOIS 61602-8866  
(309) 673-1681

OAK BROOK OFFICE:  
OAK BROOK REGENCY TOWERS  
SUITE 850  
1415 WEST 22ND STREET  
OAK BROOK, ILLINOIS 60521-2008  
(312) 954-2100

March 28, 1988

Ms. Susan Swales SHE-12  
U.S. EPA - Region V  
Waste Management Division  
CERCLA Enforcement Section  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Ninth Avenue Dump, Gary Indiana  
U.S. Scrap, Chicago Illinois

Dear Ms. Swales:

We are general counsel for Heatbath Corporation ("Heatbath"). This letter is in response to the letter sent by USEPA notifying Heatbath of potential liability with respect to the above-referenced sites and requesting information regarding shipments of hazardous waste material which may have been sent by Heatbath to these sites.

After an extensive review of their records and files, Heatbath has been unable to locate any documentation reflecting shipments of hazardous waste or other material to either of the sites in question during the period from 1965 to 1977. Heatbath further has no documents which reflect or reveal any involvement with U.S. Scrap Corp., Liquid Engineering, U.S. Drum Corp., U.S. Drum Disposal, Steve Martell or David Head. Inquiry among Heatbath personnel similarly reveals no recollection of conducting business with these individuals and businesses. Finally, Heatbath has no knowledge of the operation of the Ninth Avenue Dump or the U.S. Scrap site, or of the transportation, storage and/or disposal of waste materials at these sites by Heatbath or other persons or entities.

RECEIVED

APR 6 1988

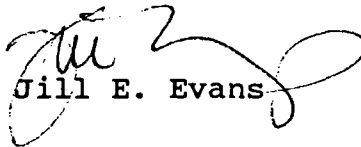
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
HAZARDOUS WASTE ENFORCEMENT SECTION

KECK, MAHIN & CATE

Ms. Susan Swales 5HE-12  
March 28, 1988  
Page 2

Should you have any questions or require any additional information please feel free to contact me. However, in light of the above, Heatbath requests that its name be deleted at this time as a potentially responsible party with respect to both of these sites.

Very truly yours,

  
Jill E. Evans

JEE;nbh

cc: Ernest Whelan  
James J. Casey  
Robin L. Lunn

STATE OF ILLINOIS)

COUNTY OF COOK

AFFIDAVIT OF PHIL L. VADEBONCOEUR

I Phil L. Vadeboncoeur, on oath depose and state:

1. I am Vice President of Heatbath Corporation.

2. I have searched the records of Heatbath


3. I have also talked with Heatbath personnel and no

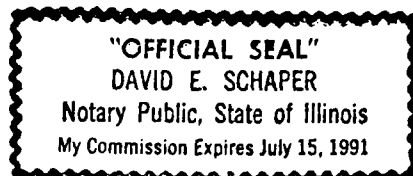
4. I have personal knowledge as to the above and

acy.

  
Phil L. Vadéboncoeur

Subscribed and sworn to before  
me this **30** day of March, 1988.

  
Notary Public



KECK, MAHIN & CATE  
8300 SEARS TOWER  
233 SOUTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606-6589



Ms. Susan Swales 5HE-12  
U.S. EPA - Region V  
Waste Management Division  
CERCLA Enforcement Section  
230 South Dearborn Street  
Chicago, IL 60604